



**DEPARTMENT OF TOXIC SUBSTANCES CONTROL  
HAZARDOUS WASTE MANAGEMENT PROGRAM  
MANAGEMENT MEMO RESCISSION DOCUMENT**

**MANAGEMENT MEMO: # EO-90-009-MM**

**TITLE:** Transfer Station Operation Pursuant to Title 22, California Code of Regulations, Section 66532 (Transfer Facility Exemption)

**AFFECTED PROGRAMS:** Permitting Division, Statewide Compliance Division and State Regulatory Program Division

**STATEMENT OF RESCISSION:**

Management Memo # EO-90-009-MM is hereby rescinded for the following reason(s):

This management memorandum interprets Title 22, California Code of Regulations (CCR), Section 66263.18 (formerly Section 66532), as follows: a transporter is exempt from the hazardous waste storage permit requirement, if the waste is stored at a transfer facility for no longer than 144 hours, in compliance with all applicable regulations. If the waste is returned to the same transfer facility, the time spent at the facility is cumulative for the purpose of determining the maximum time allowed by the exemption. This memo sets forth potentially a rule of general application and conflicts with the current regulations for the following reasons:

- C Title 22, CCR, Section 66263.18 does not specify that time spent at a transfer facility is cumulative, should the waste be returned to the same facility.
- C As provided in Title 22, CCR, Section 66263.18, the maximum allowed time for the exemption is six days for non-industrial areas and ten days if the area is zoned industrial. In this management memo, the maximum time allowed is 144 hours, with no distinction made based on zoning.

This management memo is thus in conflict with existing regulations and it is, therefore, rescinded.

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Date

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Watson Gin  
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